UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOSEPH THOMAS AND JOANNE THOMAS,

H/W

: CIVIL ACTION

V.

•

ABX AIR, INC.; AND PAC NATIONAL

NO. 02-3269

V.

:

MEESE, INC.; TRI-LINK TECHNOLOGIES, LTD.; AND GRANGER INDUSTRIES, INC.

ANSWER OF THIRD PARTY DEFENDANT MEESE, INC. TO THE CROSSCLAIM OF GRANGER INDUSTRIES, INC. A/K/A THE GRANGER PLASTICS COMPANY

- 1. Answering Third Party Defendant, Meese, Inc., incorporates by reference its responses to the Third Party Complaint herein as is set forth fully at length.
- 2. Denied. After reasonable investigation answering Third Party Defendant, Meese, Inc., is unable to form a belief as to the truth of the allegations of this paragraph and therefore said allegations are deemed denied and strict proof thereof is demanded at the time of Trial.

WHEREFORE, answering Third Party Defendant, Meese, Inc., demands that the Crossclaim of Granger Industries, Inc. a/k/a The Granger Plastics Company be dismissed with prejudice.

MARGOLIS EDELSTEIN

BY:

WALTER J. TIMBY, III, ESQUIRE Attorney for Third Party Defendant Meese, Inc. Identification No. 23894 The Curtis Center - Fourth Floor Independence Square West Philadelphia, PA 19106-3304 (215) 922-1100

VERIFICATION

Walter J. Timby, III, Esquire, states that he is the attorney for Meese, Inc., Third Party Defendant herein; that he is acquainted with the facts set forth in the foregoing Answer to Crossclaim of Granger Industries, Inc.; that the same are true and correct to the best of his knowledge, information and belief, and that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

WALTER J. TIMBY, III, ESQUIRE

Dated:

CERTIFICATE OF SERVICE

I, WALTER J. TIMBY, III, ESQUIRE, hereby certify that a true and correct copy of Third Party Defendant's Answer to Crossclaim of Granger Industries, Inc., was sent to all parties, via United States mail, postage pre-paid, on April 15, 2003.

Thomas F. Sacchetta, Esquire SACCHETTA & BALDINO 308 East 2nd Street Media, PA 19063

Stephen Ledva, Jr., Esquire MINTZER, SAROWITZ, ZERIS & LEDVA 22nd Floor 1528 Walnut Street Philadelphia, PA 19102 Robert S. Davis, Esquire DAVIS, PARRY, TYLER & WRIGHT 1525 Locust Street, 14th Floor Philadelphia, PA 19102

Marc F. Ullom, Esquire LAW OFFICE OF ANNA WALDHERR Two Penn Center Plaza 1500 JFK Boulevard, Suite 1120 Philadelphia, PA 19102

MARGOLIS EDELSTEIN

BY:

WALTER J. TIMBY, III, ESQUIRE Attorney for Third Party Defendant Meese, Inc. Identification No. 23894 The Curtis Center - Fourth Floor Independence Square West Philadelphia, PA 19106-3304 (215) 922-1100